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Attorney for Plaintiff
Jessica Bolton

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JESSICA BOLTON

Plaintiff,

v.

SERGIO BUSTOS, *et. al.*

Defendants,

) Case No. 21-CV-03466YGR
)
) **STIPULATION, REQUEST AND**
) **~~PROPOSED~~ ORDER TO CONTINUE**
) **THE TRIAL DATE AND DISCOVERY**
) **DEADLINES (as modified)**

) Hon. Yvonne Gonzalez Rogers
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1. WHEREAS, PER Docket #69, Judge Yvonne Gonzalez Rogers issued the Amended Case Management and Pre Trial Order following the parties' Stipulation, Request and Proposed Order submitted as Docket #65. The existing schedule as set forth in Docket #69 is listed below:
2. WHEREAS the parties have been meeting and conferring regarding depositions. At present Defendant has confirmed six (6) of twelve (12) depositions for April 2023.
3. WHEREAS, an attorney for Defendant is presently out on leave;
4. WHEREAS, there is a parallel state court action filed by Plaintiff (October 13, 2022) against California Department of Corrections and Rehabilitation that involve similar and related facts and issues as involved in this federal court action. The initial case management conference in that action is scheduled for July 28, 2023;
5. WHEREAS documentary discovery is also ongoing. The parties have met and conferred and are continuing to work to determine if discovery matters can be resolved through the meet and confer process or whether Court intervention is required;
6. WHEREAS, the current fact discovery cutoff is April 28, 2023;
7. WHEREAS both parties agree that additional time is required to complete key discovery, including the completion of Plaintiff's deposition and the taking of Defendants' and fact witness depositions.
8. WHEREAS both parties agree that settlement discussions with Judge Ryu would be more productive with the goal of resolving this action, provided the parties are permitted additional time to complete discovery, depositions and meaningful meet and confer, to continue the trial date and related deadlines.
9. The parties have met and conferred and hereby stipulate and jointly request that the trial date be continued, and existing discovery and other pretrial and trial deadlines be extended as noted below.

	Current Pretrial Schedule per Dkt 69	Proposed New dates
Referred to Judge Ryu	Scheduled Settlement Conference is April 14, 2023	August 2023 (as permitted by Judge Ryu's schedule)
Non Expert Discovery Cutoff:	Friday, April 28, 2023	September 1, 2023
Dispositive Motions/Daubert Motions Heard by:	Tuesday, May 15, 2023	October 27, 2023
Disclosure of Expert Reports: All Experts, Retained and Non-Retained, Must Provide Written reports Compliant with FRCP 26(A)(2)(B):	Opening: Monday June 5, 2023 Rebuttal: June 19, 2022	Opening: November 30, 2023; Rebuttal: December 14, 2023
Expert Discovery Cutoff:	July 10, 2023	January 12, 2024
Compliance Deadline	October 20, 2023	February 26, 2024
Joint Pretrial Conference Statement	October 20, 2023	February 23, 2024
Pretrial Conference	November 3, 2023	March 8, 2024
Trial Date:	November 27, 2023 at 8:30 am for (Jury Trial)	March 25, 2024, or next available (Jury Trial)

IT IS SO STIPULATED.

Dated: March 28, 2023

By: /s/ Wendy Musell

Wendy Musell
LAW OFFICES OF WENDY MUSELL
Attorney for Plaintiff
JESSICA BOLTON

Dated: March 28, 2023

By: /s/ Michael Purcell

Michael Purcell, Deputy Attorney General
Attorneys For Defendants VALENCIA, GARCIA
LOPEZ, BOWMAN, PARAMO, POLLARD,
BUSTOS

GOOD CAUSE APPEARING, IT IS SO ORDERED.

Dated: 3/30/2023


Yvonne Gonzalez Rogers
U.S. DISTRICT JUDGE